

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**[PROPOSED] ORDER GRANTING DEFENDANTS’ MOTION TO MODIFY ORDER
GRANTING PLAINTIFF’S MOTION FOR AN *EX PARTE* STATUTORY
RESTRAINING ORDER, APPOINTMENT OF TEMPORARY RECEIVER, AND
OTHER EQUITABLE RELIEF**

Defendants Traders Global Group Inc., a New Jersey corporation, Traders Global Group Inc., a Canadian business organization, and Murtuza Kazmi (collectively, “Defendants”) have filed a Motion to Modify Order Granting Plaintiff’s Motion for an *Ex Parte* Statutory Restraining Order, Appointment of Temporary Receiver, and Other Equitable Relief, pursuant to Rule 65 of the Federal Rules of Civil Procedure.

The Court has considered Defendants’ memorandum of law in support of their motion, supporting declarations and exhibits and all other memoranda submitted by the Parties in response to Defendants’ motion, and rules as follows:

1. The Temporary Receiver shall have no authority to seize Defendants’ assets, and all assets seized to date shall be promptly returned;

2. Defendants shall be granted immediate access to all systems and platforms that are necessary to review and to dispute credit card chargeback requests, including FPFX, Metatrader, and systems managed by WooCommerce and Stripe;

3. The SRO shall only apply to Defendants' assets that are traceable to allegedly disgorgeable ill-gotten gains, not all of Defendants' assets, and the CFTC shall be required to make this showing for any of Defendants' assets to remain frozen;

4. Defendants shall be granted a reasonable exemption under the SRO to pay their staff, none of whom are named defendants in this case;

5. Mr. Kazmi shall be granted a reasonable exemption under the SRO to pay his family's living expenses; and

6. Defendants shall be granted a reasonable exemption under the SRO to pay the costs of their legal defense.

Subject to the reasonable exemptions above, Defendants shall continue to refrain from withdrawing, transferring, removing, dissipating or otherwise disposing of any assets, wherever located, pending the Court's decision on Plaintiff's Motion for a Preliminary Injunction (ECF 14).

Defendants and the Receiver shall negotiate in good faith the amounts subject to the exemptions noted above.

ACCORDINGLY, Defendants' Motion to Modify Order Granting Plaintiff's Motion for an *Ex Parte* Statutory Restraining Order, Appointment of Temporary Receiver, and Other Equitable Relief, is **GRANTED**.

IT IS SO ORDERED.

Zahid N. Quraishi
United States District Judge